



United Southeast Alaska Gillnetters

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January 28, 2005

Country of Origin Labeling Program
Room 2092-S
Agricultural Marketing Service
USDA Stop 0249
1400 Independence Ave SW
Washington DC 20250-0249

RE: Docket No. LS-03-04 - Country of Origin Interim Final Rule

The United Southeast Alaska Gillnetters (USAG) is an association of about 150 small business owners who catch salmon by drift gillnetting in Southeast Alaska and market salmon throughout the United States. Many of our members also participate in other fisheries such as crab, shrimp, longline, and dive fisheries.

USAG believes the American consumer wants to know and has the right to know whether the fish and seafood products they are purchasing are wild or farm raised. We also believe the consumer wants to know where the seafood product was caught or raised and that providing this information to the consumer was the intent of the Country of Origin (COOL) legislation passed by Congress. While we are heartened that the USDA has included the method of production as a requirement on the label of unprocessed seafood, we believe this labeling requirement must be extended to processed seafood such as canned, smoked and cured products. Not including these processed seafood products under the labeling requirements means that less than 20% of all seafood products will be adequately labeled. We believe this is completely unacceptable.

There is also an issue concerning which retailers are required to have COOL labeling on the seafood products they sell. We believe the COOL labeling requirements should be extended to all retailers who sell seafood products containing more than 50% fish or shell fish by weight. We are aware of retailers claiming that the implementation of the COOL requirements are too expensive and will increase the price of their products. USAG believes the general public has demonstrated in many ways its willingness to pay for products they know are uncontaminated and of proven quality. This is why retailers such as Whole Foods and Wild Oats Markets have enjoyed such success.

In summery, USAG requests that the USDA change its Interim Final Rule for implementation of Country of Origin Labeling to cover processed seafood and all retailers who are selling seafood products.

Yours truly,

A handwritten signature in black ink, appearing to read "Kenneth Duckett", with a long horizontal flourish extending to the right.

Kenneth Duckett
Executive Director

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